## LAZARE POTTER & GIACOVAS LLP

Attorneys at Law

950 Third Avenue • New York, New York 10022 Telephone (212) 758-9300 • Pacsimile (212) 888-0919

www.lpglip.com

WRITER'S EMAIL

WRITER'S DIRECT DIAL

rgill@lpgllp.com

(212) 784-2413

July 25, 2012

VIA ECF and Facsimile - (718) 613-2365

Honorable Judge Cheryl L. Pollak United States Magistrate Judge United States District Court Eastern District of New York Brooklyn, New York 11201

Re:

C.E. Flushing, LLC v. Travelers Property Casualty Company of America 11 CV 3477 (SLT) (CLP)

Dear Judge Pollak:

This firm represents Defendant Travelers Property Casualty Company of America ("Travelers") in the above-referenced matter. We write, with the consent of Plaintiff's counsel, to respectfully request the following one-week adjournments of the parties' respective supplemental discovery responses as discussed during the July 11, 2012 telephone status conference and the motion to amend briefing schedule.

- The parties' exchange of supplemental discovery responses is extended from July 31, 2012 to August 7, 2012;
- Defendant's time to serve its motion to amend is extended from August 3, 2012 to August 10, 2012;
- Plaintiff's time to serve any response to the motion to amend is extended from August 24, 2012 to August 31, 2012; and
- Defendant's time to serve any reply is extended from September 7, 2012 to September 14, 2012.

This extension is requested due to the voluminous nature of the documents involved in the matter and the parties' continued efforts to review the documents for privilege, relevance and/or production, as well as additional time to finalize the motion to amend. This is the first request seeking an extension of the above deadlines. Additionally, Plaintiff has requested, with the consent of Defendant, a one-week adjournment of the pre-motion conference scheduled before Honorable Sandra L. Townes from August 9, 2012 to August 16, 2012.

We thank the Court for its consideration.

Respectfully submitted,

Rippi Gill

cc: Via ECF

K&L Gates LLP

One Newark Center, Tenth Floor Newark, New Jersey 07102-5282

Attorneys for Plaintiff

Request to extend discovery deadline and ochedule for submission of papers on The motion to amend is granted. The request to adjourn the pre-motion conference should be addressed to Judge Townes.

So Ordered

/S/ CHERYL POLLAK / WMJ 1/26/12